

EXHIBIT “A”**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Al Haramain Islamic Foundation (“AHIF”)	<p>AHIF has long provided financial services and other forms of material support to terrorist organizations, including al Qaida. Indeed, AHIF has long acted as a fully integrated component of al Qaida’s worldwide logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated foreign terrorist organizations.</p> <p>AHIF has offices all over the world from which it coordinates its support for the Enterprise, Radical Muslim Terrorism, and an interlocking management by which it effectuates that support. For example, Aqeel Abdulaziz Al-Aqil, a Saudi, is Secretary General of the Saudi AHIF located in Riyadh and president of the Oregon AHIF. Mansour Al-Kadi, a Saudi, is deputy director general of the Saudi AHIF, "head" of AHIF’s Africa Committee, and vice president of the Oregon AHIF.</p> <p>AHIF has advertised its connection to al Qaida. AHIF’s website used to have a direct link to the al Qaida site about the Chechnyan operations (qoqaz.com). The website is part of the al Qaida propaganda organization, Azzam Publications group of websites, including qoqaz.com, qoqaz.net, and azzam.com (among others).</p> <p>Numerous branches of AHIF, including Afghanistan, Albania, Bangladesh, Bosnia, Ethiopia, Herzegovina, Indonesia, Kenya, the 1962(c) 1962(d) 9 Netherlands, Tanzania and Pakistan, have been designated as sponsors and supporter of al Qaida and affiliated FTOs.</p> <p>When viewed as a single entity, AHIF is one of the principal Islamic organizations providing support for the al Qaida network and promoting militant Islamic doctrine worldwide. Under the leadership of Aqeel Abdulaziz Al-Aqil, the founder and long-time leader of AHIF and an al Qaida supporter, AHIF, numerous AHIF field offices and AHIF representatives operating throughout Africa, Asia, Europe and North America provided financial and</p>	1962(a) 1962(c) 1962(d)

	<p>material support to the al Qaida network.</p> <p>Also under Aqeel Abdulaziz Al-Aqil's leadership, AHIF implemented its tasks through its offices and representatives, which span more than fifty countries around the world. AHIF maintained nine general committees and several other "active committees" that included the "Continuous Charity Committee, African Committee, Asian Committee, Da'wah and Sponsorship Committee, Masjid Committee, Seasonal Projects Committee, Doctor's Committee, European Committee, Internet and the American Committee, the Domestic Committee, Zakaat Committee and the Worldwide Revenue Promotion Committee."</p> <p>In Southeast Asia, AHIF served as a primary source of al Qaida funding.</p> <p>In Africa, AHIF was heavily involved in plotting terrorist attacks against Americans, including but not limited to the suicide bomber attacks against the U.S. Embassies in Nairobi and Dar es Salaam in which 224 people were killed.</p> <p>AHIF's Pakistan office provided funding and logistical support for the acquisition and delivery of Zenit missiles, Sting anti-aircraft missiles, and hand-held anti-tank weapons to 10 al Qaida and al Qaida affiliated militants.</p> <p>In Europe, AHIF sponsored al Qaida activity through the al Nur Mosque which served as a meeting place, recruitment center and base of operations for al Qaida within Germany. At the direction of the Kingdom of Saudi Arabia, AHIF contributed in excess of \$1 million dollars to the Mosque, funding the purchase of the land for the Mosque as well as its construction.</p> <p>AHIF also sponsored al Qaida operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee (the "SJRC"). The SJRC offices in Pristine, Kosovo served as a cover for al Qaida operatives. Furthermore, between 1998 and 2000, the Kingdom of Saudi Arabia, through the SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with the SJRC bureaus.</p>	
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	<p>In the United States, AHIF's Ashland, Oregon office committed violations of the Internal Revenue Code, Money Laundering Control Act and Bank Secrecy Act which funneling money to al Qaida.</p> <p>In 2002, an intelligence report from the Bosnian Intelligence Services (AID- Agency for investigation and Documentation) revealed the active role of Vakufska Banka D.D. in terrorism funding. Indeed, AID described Vakufska Banka D.D. and the merged Depozitna Banka D.D., as a financial platform assisting al Haramain Islamic Foundation and al-Qaeda activities:</p> <p style="padding-left: 40px;">“The HO (al Haramain) spent around 13 KM (\$7,647,000) between its foundation in 1997 and the end of last year2000. Financial transactions were through accounts at the Depozit[na] Bank, now the Vakufska Bank, whose major shareholders have been linked with PIS operating illegal money laundering”.</p> <p>The Bosnian Intelligence memo regarding the activities of Al Haramain states the following:</p> <p style="padding-left: 40px;">“Given all the above security factors, we believe that the clear lack of any concrete humanitarian projects indicates that the existence of this HO [Humanitarian Organization] was a fictitious cover (...)”</p> <p>The report establishes Al Haramain role in financing and assisting Osama Bin Laden operations.</p> <p style="padding-left: 40px;">“Saudi HO [Humanitarian Organization] Al Haramain, (...) has acted as a channel for financing the activities of terrorist organizations. (...) According to available intelligence, the Sarajevo office assisted the terrorist organization Gama Al Islamija, while members of Bin Laden's El Itihad al Islamija (AIAI) terrorist groups were employed at the Somalia offices, which also financed their operations.”</p> <p>The charity allegedly wired \$1 million to Chechen rebels in 1999 and arranged to buy 500 heavy weapons for them</p>	
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	<p>from Taliban units. The Russian security service, FSB, has publicly alleged that Al Baraka Bank was used by the Saudi Al-Haramain Charitable Foundation to funnel money to Islamic resistance fighters in Chechnya.</p> <p>In 2004, the United States Attorney's Office for the District of Oregon announced the execution of a federal search warrant against property purchased on behalf of the Al Haramain Islamic Foundation, Inc. in Ashland, Oregon. The accompanying affidavit by IRS Special Agent Colleen Anderson alleges Al Haramain and its officers attempted to conceal the transfer of \$130,000 in American Express traveler's checks and a \$21,000 cashier's check intended for aid to Muslims in Chechnya in mid-March of 2000. The affidavit also states that on several occasions from 1997 to 2001, Soliman H. Al-Buthe, co-founder of the U.S. branch of Al Haramain, brought significant sums of traveler's checks into the United States, according to declarations he made when entering the country. In 13 trips, he reported bringing in \$777,845, of which \$206,000 was used to buy the Ashland headquarters in 1997. But there is no explanation for the balance, Anderson wrote.</p> <p>In early 2000, an Egyptian doctor wired a \$150,000 donation from his London bank account to Al-Haramain's Ashland bank, according to the affidavit. An e-mail from the doctor said the money was meant "to participate in your noble support to our Muslim brothers in Chechnya."</p> <p>At the time, Russian forces were battling Chechen rebels for control of the region. The fight was considered a jihad, or holy war, by some Muslim factions.</p> <p>The affidavit said that 11 days after the doctor's donation showed up in Oregon, Al-Buthe traveled to Ashland from Saudi Arabia. He joined Perouz Sedaghaty ("Seda"), co-founder of the U.S. branch of Al Haramain, at an Ashland bank and the two took out \$130,000 -- buying 130 traveler's checks in \$1,000 denominations, the affidavit said. A bank clerk suggested it would be easier to issue a cashier's check, the affidavit said.</p> <p>"Seda said he could not take a cashier's check because the money was to help people and a lot of times these</p>	
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	<p>people may not be able to negotiate a cashier's check," the affidavit said.</p> <p>Seda took an additional \$21,000 in a cashier's check, giving that to Al-Buthe, the affidavit said. The check had the notation: "Donations for Chichania Refugees," the affidavit said.</p> <p>The affidavit said Seda -- using the name Abu Yunus -- signed an agreement with Al-Buthe saying he was relinquishing the money for "brothers and sisters in Chechnya."</p> <p>Within days, Al-Buthe returned to Saudi Arabia, failing to declare to Customs, as required, that he was taking the traveler's checks out of the United States, the affidavit said. Once back in Saudi Arabia, Al-Buthe cashed the traveler's checks and put the cashier's check into his personal account. It is unknown what happened to the money.</p> <p>Al Haramain's 2000 tax return underreported income by \$21,000, underreported grants by \$150,000, and overstated the price of a second prayer house that Al-Haramain bought in Missouri.</p> <p>The tax return shows that "Seda, or one of his associates, improperly listed the \$131,300 disbursement to Al-Buthe as funds used to purchase the Springfield prayer house</p> <p>AHIF thereby has, for a period of many years, provided critical financial and logistical support to al Qaida to support that terrorist organization's global jihad. The September 11th Attack was a direct, intended and foreseeable product of AHIF's participation in al Qaida's jihadist campaign.</p>	
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